



James M. Strauss
77 Water Street, Suite 2100
New York, New York 10005
James.Strauss@lewisbrisbois.com
Direct: 212.232.1344

September 10, 2024

File No. 29881.445

VIA ECF

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Room 15A
New York, New York 10007

**Re: Williams Polanco v. Protective Insurance Company;
Case No. 23-cv-00062**

Dear Judge Subramanian:

Please allow the following to serve as the parties' joint letter to request a modification of dates with respect to Your Honor's July 31, 2024 Scheduling Order and the submission of the parties' joint pretrial order.

The current deadline to file the parties' Joint Pretrial Order is September 20, 2024. The parties have conferred and would like to explore settlement through mediation in the hopes of resolving this matter prior to trial. The parties have agreed to mediate this case on October 2, 2024 through private mediation.

Accordingly, the parties respectfully request an extension of time with respect to submitting the joint pretrial order and all pre-trial materials to October 11, 2024, which is two weeks prior to the October 28, 2024 trial date.

We thank you for your Honor's consideration to this matter.

Respectfully,

James M. Strauss

James M. Strauss of
LEWIS BRISBOIS BISGAARD & SMITH LLP